

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Eddie B Bates, Jr., Debtor

**Case No. 25-00216-KMS
CHAPTER 13**

NOTICE

The above referenced debtor has filed papers with the court to allow payment arrearage.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to amortize the payments, or if you want the court to consider your views on the Motion, then on or before 30 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk
U.S. Bankruptcy Court
Dan M. Russell, Jr. United States Courthouse
2012 15th St., Ste. 244
Gulfport, MS 39501

If you mail your request to the court for filing, you must mail it early enough so the court will **receive** it on or before the date state above.

You must also mail a copy to the debtors' attorney:

The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief, which shall sustain this Motion to Allow Payment Arrearage.

Date: June 26, 2025 Signature: /s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr. (MSBN 103469)
Jennifer Ann Curry Calvillo (MSBN 104367)
The Rollins Law Firm, PLLC
P.O Box 13767
Jackson, MS 39236

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Eddie B Bates, Jr., Debtor

**Case No. 25-00216-KMS
CHAPTER 13**

MOTION TO ALLOW PAYMENT ARREARAGE

COMES NOW, Debtor, by and through counsel, and moves this Court to amortize their past due Chapter 13 plan payments, and in support thereof, would show the Court as follows:

1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code.
2. Debtor fell behind on his payments due to the employer not withholding the plan payments. The employer has now started withholding the plan payments.
3. Debtor is requesting this Honorable Court to amortize the past due plan payments over the life of the plan, including any ongoing mortgage payments being paid through the plan.
4. Debtor is requesting that their Chapter 13 plan payments be increased as necessary to compensate for the lost plan payments with ongoing payments to resume in July 2025.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MS Bar No. 103469)

Jennifer Ann Curry Calvillo (MS Bar No. 104367)

The Rollins Law Firm, PLLC

P.O. Box 13767

Jackson, MS 39236

601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Motion to Allow Payment Arrearage was forwarded on June 27, 2025, to:

By Electronic CM/ECF Notice:

Chapter 13 Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr.

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4 UNITED STATES BANKRUPTCY COURT
5 SOUTHERN DISTRICT OF MISSISSIPPI
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10 IN RE:
11 EDDIE B BATES, JR12 CASE NO: 25-00216
13
14 **DECLARATION OF MAILING**
15 **CERTIFICATE OF SERVICE**
16 Chapter: 1317
18 On 6/27/2025, I did cause a copy of the following documents, described below,
19
20 Notice and Motion to Allow Payment Arrearages21
22
23 to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with
24 sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and
25 incorporated as if fully set forth herein.26
27 I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.
28 com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to
29 Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if
30 fully set forth herein.31
32 Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been
33 served electronically with the documents described herein per the ECF/PACER system.

34 DATED: 6/27/2025

35
36 /s/ Thomas C. Rollins, Jr.
37 Thomas C. Rollins, Jr.38
39 The Rollins Law Firm
40 702 West Pine St
41 Hattiesburg, MS 39401
42 601 500 5533
43 trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:
EDDIE B BATES, JR.

CASE NO: 25-00216

**CERTIFICATE OF SERVICE
DECLARATION OF MAILING**

Chapter: 13

On 6/27/2025, a copy of the following documents, described below, will be served on the parties listed in the "Service" section of this document:
Notice and Motion to Allow Payment Arrearages

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 6/27/2025

William H. H.

Miles Wood
BK Attorney Services, LLC
d/b/a certificateofservice.com, for
Thomas C. Rollins, Jr.
The Rollins Law Firm
702 West Pine St
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

CASE INFO

LABEL MATRIX FOR LOCAL NOTICING
 NCRS ADDRESS DOWNLOAD
 CASE 25-00216
 SOUTHERN DISTRICT OF MISSISSIPPI
 THU JUN 26 13-7-13 PST 2025

21ST MORTGAGE CORPORATION
 CO EDWARD E LAWLER JR
 LAWLER FOREMAN PLLC
 POST OFFICE BOX 2488
 RIDGELAND MS 39158-2488

21ST MORTGAGE CORPORATION AS SUCCESSOR
 TO U
 POST OFFICE BOX 2488
 RIDGELAND MS 39158-2488

EXCLUDE

US BANKRUPTCY COURT
 THAD COCHRAN US COURTHOUSE
 501 E COURT STREET
 SUITE 2300
 JACKSON MS 39201-5036

(P) 21ST MORTGAGE CORPORATION
 PO BOX 477
 KNOXVILLE TN 37901-0477

ALLIED INTERSTATE LLC
 PO BOX 361445
 COLUMBUS OH 43236-1445

CREDIT ACCEPTANCE CORPORATION
 25505 W 12 MILE RD STE 3000
 SOUTHFIELD MI 48034-8331

CREDIT ACCEPTANCE
 PO BOX 5070
 SOUTHFIELD MI 48086-5070

DEIDRE THOMAS
 4601 COUNTY FARM RD
 LIBERTY MS 39645-8118

DISH NETWORK
 PO BOX 105169
 ATLANTA GA 30348-5169

LAWLER FOREMAN PLLC
 PO BOX 2488
 RIDGELAND MS 39158-2488

MDES BENEFIT PAY
 PO BOX 22730
 JACKSON MS 39225-2730

MS DEPT OF EMPLOYMENT SECURITY
 PO BOX 1699
 JACKSON MS 39215-1699

MCCARTHY BURGESOT WOL
 26000 CANNON RD
 BEDFORD OH 44146-1807

NATIONS LAW FIRM
 9703 RICHMOND AVE
 200
 HOUSTON TX 77042-4863

PREMIER BANKCARD LLC JEFFERSON CAPITAL
 SYS
 JEFFERSON CAPITAL SYSTEMS LLC
 PO BOX 7999
 ST CLOUD MN 56302-7999

SOUTHERN FINANCE LLC
 811C DELAWARE AVE
 MCCOMB MS 39648-3823

SAFEWAY INSURANCE CO
 PO BOX 98179
 JACKSON MS 39298-8179

SOUTHERN FINANCE
 2603 OAK GROVE RD
 HATTIESBURG MS 39402-8928

EXCLUDE
 UNITED STATES TRUSTEE
 501 EAST COURT STREET
 SUITE 6-430
 JACKSON MS 39201-5022

(P) VIASAT INTERNET SERVICE
 ATTN VIASAT INC
 349 INVERNESS DRIVE SOUTH
 ENGLEWOOD CO 80112-5882

EXCLUDE

(P) DAVID RAWLINGS
 ATTN DAVID RAWLINGS CHAPTER 13 TRUSTEE
 PO BOX 566
 HATTIESBURG MS 39403-0566

DEBTOR

EDDIE B BATES JR
 4601 D COUNTY FARM RD
 LIBERTY MS 39645-8118

EXCLUDE

THOMAS CARL ROLLINS JR
 THE ROLLINS LAW FIRM PLLC
 PO BOX 13767
 JACKSON MS 39236-3767